

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY,

Plaintiff,

vs.

CHRISTIAN EXOO a/k/a ANTIFASH  
GORDON; ST. LAWRENCE UNIVERSITY;  
TRIBUNE PUBLISHING COMPANY; NEW  
YORK DAILY NEWS; VIJAYA GADDE;  
TWITTER, INC; COHEN, WEISS AND  
SIMON, LLP;

Defendants.

CIVIL ACTION NO.: 2:20-cv-12880-  
JMV-JAD

Hon. John M. Vazquez, U.S.D.J.

Oral Argument Requested

Return Date: March 1, 2021

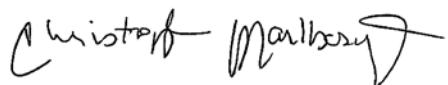
**PLEASE TAKE NOTICE** that on March 1, 2021, or on a date and time to be set by the Court, Defendants Christian Exoo (“Defendant”), by and through his attorneys, The Marlborough Law Firm, P.C., ZMO Law PLLC shall move before the United States District Court for the District of New Jersey, located at Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, for the entry of an Order pursuant to F.R.C.P. 12(b)(6) dismissing with prejudice Counts II, III, IV, V, VI, VIII, IX, X, XI of Plaintiff’s Complaint and the Cross-claims filed by Co-Defendant Cohen, Weiss and Simon, LLP.

**PLEASE TAKE FURTHER NOTICE** that in support of the within Motion, Defendants shall rely upon the Memorandum and Declaration of Christopher Marlborough submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is also submitted herewith.

Dated: December 6, 2020

By:



**THE MARLBOROUGH LAW FIRM, P.C.**

Christopher Marlborough, Esq.

445 Broad Hollow Road, Suite 400

Melville, New York 11747

Phone: (212) 991-8960

Fax: (212) 991-8952  
E-mail: [chris@marlboroughlawfirm.com](mailto:chris@marlboroughlawfirm.com)

**ZMO LAW PLLC**  
Victoria Medley  
260 Madison Avenue, 17<sup>th</sup> Floor  
New York, New York 10016  
Phone: (212) 685-0999  
Fax: (212) 991-8952  
E-mail: [vm@zmolaw.com](mailto:vm@zmolaw.com)

*Counsel for Defendant Christian Exoo*